Remarks/Arguments

The Examiner is thanked for the careful review of this Application. Claims 1-14 and 16-22 are pending after entry of the present Amendment. Claim 15 has been cancelled. Amendments have been made to the claims to better define the invention. Claims 16-19 have been objected to, and claims 7-10 have been allowed. The amendments do not introduce new matter.

Rejections under 35 U.S.C. §112, First Paragraph:

Claims 3 and 20 have been rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. The Applicants respectfully submit that rejection of claim 20 under 35 U.S.C. §112, first paragraph is moot as the claim has been amended, and the term "dynamically" has been deleted.

As to the claim 3, the Applicants have replaced the term "coupled" in the claims with the term "connected." As also noted by the Office, the processors 352 and 354 are defined in the bulk decoder, which in turn is connected to the network and the network data interconnect. Accordingly, the Applicants respectfully request that the 35 U.S.C. §112, first paragraph rejections of claims 3 and 20 be withdrawn.

Rejections under 35 U.S.C. § 102(e):

Claims 1-6 and 11 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,031,577 to Ozkan et al. (hereinafter "Ozkan"); Claims 1, 6, 15, and 21 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,124,880 to Shafiee et al. (hereinafter "Shafiee); and Claims 11, 12, 13, 14, and 22 have been rejected under 35 under U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,246,490 to Sebestyen et al. (Sebestyen). The Applicants respectfully submit that rejection of claim 15 is moot due to cancellation of independent claim 15 and amendments made to claim 16 so as to include all the features of the base claim 15. In accordance with the Office Action, claims 16-19 are now allowable as claim 16 has been written in independent format.

The Applicants respectfully traverse the Office's rejections, as the cited art of record fails to disclose each and every of the claimed invention as defined in amended independent claims 1, 11, 21, and 22 for at least the following reasons: As amended, independent claim 1 defines a multimedia system that includes a bulk decoder, output devices, <u>a network data interconnect via which the decoded data is transmitted to the output devices</u>, and a server configured to control the output devices. Similarly, as amended, independent claim 11 specifically defines that the decoded signals are transmitted to the corresponding devices via a network data interconnect. However, among other features, Ozkan fails to disclose a network

data interconnect that can be used to transmit data from the alleged decoder to more than one output device. Rather, Ozkan discloses sending decoded data to a single display via a single line.

Likewise, Shafiee fails to disclose each and every feature of the claimed invention, as defined in amended independent claims 1 and 21. Among other features, Shafiee fails to disclose a server that is coupled to the network and is configured to control the bulk decoder. In the Office Action, the Office has interpreted that the gateways and the switching subsystem collectively form the bulk decoder of the claimed invention. However, none of the components of Shafiee can control the collection of the gateway blocks and switching subsystem (interpreted by the Office to be the bulk decoder of the claimed invention). In fact, the Office's interpretations are contradictory. In rejecting independent claim 1, the Office has considered the collection of the gateways and the switch component to be the bulk decoder. However, in rejecting claim 6, the Office has interpreted that each independent gateway block constitutes a bulk decoder.

In the same manner, Sebestyen fails to disclose each and every feature of the amended independent claims 11 and 22 for several reasons. Among other features, Sebestyen fails to disclose a demultiplexer and a multiplexer. Rather, Sebestyen discloses a single component multiplexer/demultiplexer 8 that the Office interprets to be both, the multiplexer and demultiplexer of the claimed invention. Furthermore, in the claimed invention, at least one decoder is coupled between the multiplexer and demultiplexer. In Sebestyen, however, the decoder is coupled to the single component 8 (interpreted by the Office to be both, the multiplexer and demultiplexer of the claimed invention), and not between the multiplexer and demultiplexer. Yet further, in the claimed invention, the bulk decoder distributes decoded data to corresponding output devices through a network data interconnect. In Sebestyen, however, as depicted in the Figure 3 referred to by the Office, each decoder is directly coupled to a respective device through a respective line. In contrast, in the claimed invention, the decoded signals are distributed through a network data interconnect.

Thus, the cited prior art fails to disclose each and every feature of the claimed invention as defined in amended independent claims 1, 11, 16, 21, and 22. Similarly, the cited prior art fails to disclose each and every feature of the claimed invention, as defined in dependent claims 2-6, 8-10, 12-14, and 17-19 for at least the same reasons discussed above. As such, the Applicants respectfully request that rejection of the claims based on 35 U.S.C. section 102(e) be withdrawn.

Rejections under 35 U.S.C. § 103(a):

The Office has rejected claim 20 under 35 U.S.C. 103(a), as being unpatentable over

Shafiee in view of the paper entitled "Real-Time Parallel MPEG-2 Decoding in Software" to Bilas et al. (hereinafter "Bilas"). The Office has further rejected claims 4 and 5 under 35 U.S.C. 103(a), as being unpatentable over Shafiee in view of "Computer Dictionary" to Microsoft. The Applicants respectfully submit that rejection of claim 20 is moot due to cancellation of independent claims and amendments to dependent claim 16, as described in more detail with respect to section 102(e) rejection of claim 15. Thus, 103(a) rejection of claim 20 should be withdrawn because as amended, dependent claim 20 depends from the claim 16.

The Applicants respectfully traverse the Office's rejections as the combination of the cited prior art fails to raise a *prima facie* case of obviousness against the subject matter defined in dependent claims 4 and 5. The Applicants respectfully submit that the combination of Shafiee and the Computer Dictionary fails to disclose, teach, or suggest all the features of the claimed invention, as defined in claims 4 and 5. For instance, in the claimed invention, the amended independent claim 1 recites a multimedia system wherein a bulk decoder is controlled by a server coupled to the network. However, Shafiee fails to disclose, teach, or suggest a bulk decoder that can be controlled by the server. As explained in more detail with respect to section 102(e) rejections, none of the components of Shafiee coupled to the alleged network, can provide any of the functionalities of the server, as defined in the claimed invention. Accordingly, it is respectfully requested that rejection of claims 4 and 5 under 103(a) be withdrawn.

Indication of Allowability:

The Applicants herein acknowledge the allowability of claims 7-10. The Applicants further acknowledge the allowability of claims 16-19, as allowed.

In view of the foregoing, the Applicants respectfully submit that claims 1-6, 11-14, and 16-22 are in a condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6913. If any additional fees are due in connection with filing this Amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP580). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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